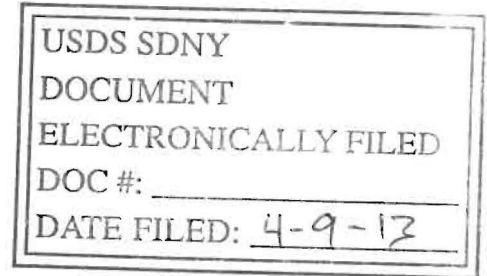


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April 8, 2013

The Honorable Richard J. Sullivan
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 615
New York, New York 10007



RE: *United States v. Oliver Pan, et al.*, S1 12 Cr. 153 (RJS)

Dear Judge Sullivan:

We write as counsel to Oliver Pan in the referenced case to join in and strongly endorse the arguments and requests made by counsel for Ms. Hou in their letter to the Court dated April 8, 2013.

We have no information about the reasons for the timing of the arrests described in counsel's letter beyond the public record. What is clear is that this highly questionable decision as to when to arrest and what kind of media presentation would be made with the arrest was a matter entirely within the discretion of the United States Attorneys' Office. The necessity for making those arrests based upon complaints and not indictments and those media presentations on April 2, 2013 and April 4, 2013 is not apparent. At best there appears to have been a failure to appreciate their likely prejudicial impact less than two weeks before the start of our trial. At worst the decision was an improper attempt to bolster what we believe the evidence will show to be a weak case brought for the wrong reasons.

Whatever the reasons for the timing of those arrests and accompanying media pronouncements, we respectfully submit that their likely prejudicial impact make it incumbent upon the Court to take the strongest possible measures to protect the defendants' right to a fair trial.

Respectfully submitted,

TESSER, RYAN & ROCHMAN, LLP

By: _____/s/_____
Irwin Rochman
Gregory J. Ryan